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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 MICHAEL J. MONA, JR., an individual,

13 Plaintiff,

14 vs.

15 MICHAEL SIFEN, an individual

16 Defendants.

Case Number:  
2:22-cv-00821-CDS-VCF

17 **STIPULATION AND ORDER TO**  
**REQUEST FOR EXTENSION OF TIME**  
**TO FILE OPPOSITION**

**(FIRST REQUEST)**

18 Plaintiff Michael J. Mona, Jr. (“Mona”), by and through his counsel of record, Liane K.  
19 Wakayama, Esq., Dale A. Hayes, Jr., Esq., and Jeremy D. Holmes, Esq., of the law firm of Hayes  
20 Wakayama and Defendant Michael Sifen (“Sifen”), by and through his counsel of record,  
21 Matthew T. Dushoff, Esq., and William A. Gonzales, Esq., of the law firm of Saltzman Mugan  
22 Dushoff hereby stipulate as follows:

23 1. On May 24, 2022, Mona filed his Complaint;  
24 2. On July 19, 2022, Sifen filed his Motion to Dismiss Plaintiff’s Complaint (“Motion  
25 to Dismiss”);  
26 3. Mona’s response to Sifen’s Motion to Dismiss is currently due on Tuesday, July 26,  
27 2022;

1       4.    Mona's counsel handling this case is currently experiencing serious health  
2 complications and has needed to be hospitalized, leaving Mona unable to meet the originally set  
3 briefing deadlines.

4       5.    Sifen has agreed to give Mona up through and including August 16, 2022 in which  
5 to file a response to Sifen's Motion to Dismiss Complaint.

6       6.    There are no other deadlines that are affected by this stipulation and proposed order  
7 that are presently known to the parties; and

8       7.    This is the first stipulation and is not entered for any improper purpose or to delay.

9       8.    Therefore, the Parties hereby stipulate and agree that Mona has up through and  
10 including August 16, 2022 in which to respond to Sifen's Motion to Dismiss.

11      Dated this 21st day of July, 2022

12      Dated this 21st day of July, 2022

13      **HAYES | WAKAYAMA**

14      By: *s/ Jeremy D. Holmes, Esq.*

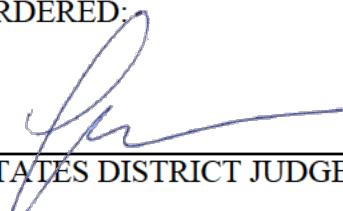
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23      *Attorneys for Plaintiff*

24      By: *s/ Matthew T. Dushoff, Esq.*

25      MATTHEW T. DUSHOFF, ESQ.  
26      Nevada Bar No. 004975  
27      WILLIAM A. GONZALES, ESQ.  
28      Nevada Bar No. 015230  
29      SALTZMAN MUGAN DUSHOFF  
30      1835 Village Center Circle  
31      Las Vegas, Nevada 89134  
32      *Attorneys for Defendant*

33      **ORDER**

34      IT IS SO ORDERED:

35        
36      \_\_\_\_\_  
37      UNITED STATES DISTRICT JUDGE

38      DATED: July 22, 2022